
UNITED STATES DISTRICT COURT

District of Kansas
(Topeka Docket)

UNITED STATES OF AMERICA,

Plaintiff,

v.

CASE NO.: 24-40044-TC-RES _

LESTER RANDALL,

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Assault
[18 U.S.C. §§ 113(a)(7) and 1153]

That on or about September 29, 2023, in the District of Kansas, and within the confines of the Kickapoo Tribe in Kansas, Indian Country, as defined in 18 U.S.C. § 1151, the defendant,

LESTER RANDALL,

an Indian person, knowingly, willfully, and intentionally assaulted E.R., whose identity is known to the Grand Jury, who was RANDALL's spouse, intimate partner, and dating partner, by physically striking E.R. with a wooden bowl, resulting in substantial bodily injury to E.R.

All in violation of Title 18, United States Code, Section 113(a)(7), namely, Assault Resulting in Substantial Bodily Injury to a Spouse, Intimate Partner, and Dating Partner, with reference to Title 18, United States Code, Section 1153(a), namely, Offenses Committed within Indian Country.

COUNT TWO

**Assault
[18 U.S.C. §§ 113(a)(7) and 1153]**

That on or about April 9, 2024, in the District of Kansas, and within the confines of the Kickapoo Tribe in Kansas, Indian Country, as defined in 18 U.S.C. § 1151, the defendant,

LESTER RANDALL,

an Indian person, knowingly, willfully, and intentionally assaulted E.R., whose identity is known to the Grand Jury, who was RANDALL's spouse, intimate partner, and dating partner, by physically striking E.R. in the head with an X-Box headset, resulting in substantial bodily injury to E.R.

All in violation of Title 18, United States Code, Section 113(a)(7), namely, Assault Resulting in Substantial Bodily Injury to a Spouse, Intimate Partner, and Dating Partner,

with reference to Title 18, United States Code, Section 1153(a), namely, Offenses Committed within Indian Country.

COUNT THREE

**Assault
[18 U.S.C. §§ 113(a)(8) and 1153]**

That on or about April 17, 2024, in the District of Kansas, and within the confines of the Kickapoo Tribe in Kansas, Indian Country, as defined in 18 U.S.C. § 1151, the defendant,

LESTER RANDALL,

an Indian person, knowingly, willfully, and intentionally assaulted E.R., whose identity is known to the Grand Jury, who was RANDALL's spouse, intimate partner, and dating partner, by strangling and attempting to strangle E.R.

All in violation of Title 18, United States Code, Section 113(a)(8), namely, Assault of a Spouse, Intimate Partner, and Dating Partner by Strangling, Suffocating, or Attempting to Strangle and Suffocate, with reference to Title 18, United States Code, Section 1153(a), namely, Offenses Committed within Indian Country.

COUNT FOUR

**Assault
[18 U.S.C. §§ 113(a)(3) and 1153]**

That on or about April 25, 2024, in the District of Kansas, and within the confines of the Kickapoo Tribe in Kansas, Indian Country, as defined in 18 U.S.C. § 1151, the defendant,

LESTER RANDALL,

an Indian person, knowingly, willfully, and intentionally assaulted E.R., whose identity is known to the Grand Jury, with a dangerous weapon, namely, an aluminum baseball bat, with the intent to do bodily harm.

All in violation of Title 18, United States Code, Section 113(a)(3), namely, Assault with a Dangerous Weapon, with reference to Title 18, United States Code, Section 1153(a), namely, Offenses Committed within Indian Country.

A TRUE BILL.

July 17, 2024
DATE

s/Foreperson
FOREPERSON OF THE GRAND JURY

KATE E. BRUBACHER
UNITED STATES ATTORNEY
District of Kansas

By: /s/ Jared S. Maag

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Ks. S. Ct. No. 17222

IT IS REQUESTED THAT THE TRIAL BE HELD IN TOPEKA, KANSAS

PENALTIES

COUNTS ONE and TWO

Assault

[18 U.S.C. §§ 113(a)(7) and 1153]

- A term of imprisonment not to exceed five (5) years.
18 U.S.C. § 113(a)(7).
- A fine not to exceed \$250,000.00.
18 U.S.C. § 3571(b)(3).
- Or both.
- A term of supervised release not to exceed three (3) years.
18 U.S.C. § 3583(b)(2).
- A mandatory special assessment of \$100.00 per count of conviction.
18 U.S.C. § 3013(a)(2)(A).

COUNT THREE

Assault

[18 U.S.C. §§ 113(a)(8) and 1153]

- A term of imprisonment not to exceed ten (10) years.
18 U.S.C. § 113(a)(8).
- A fine not to exceed \$250,000.00.
18 U.S.C. § 3571(b)(3).
- Or both.
- A term of supervised release not to exceed three (3) years.
18 U.S.C. § 3583(b)(2).
- A mandatory special assessment of \$100.00 per count of conviction.
18 U.S.C. § 3013(a)(2)(A).

COUNT FOUR

Assault

[18 U.S.C. §§ 113(a)(3) and 1153]

- A term of imprisonment not to exceed ten (10) years.
18 U.S.C. § 113(a)(3).
- A fine not to exceed \$250,000.00.
18 U.S.C. § 3571(b)(3).
- Or both.
- A term of supervised release not to exceed three (3) years.
18 U.S.C. § 3583(b)(2).
- A mandatory special assessment of \$100.00 per count of conviction.
18 U.S.C. § 3013(a)(2)(A).